

JUSTICE FIRST, LLP

JUSTICE FIRST, LLP  
Jenny C. Huang, SBN 223596  
2831 Telegraph Avenue  
Oakland, CA 94609  
Telephone: (510) 628-0695  
Fax: (510) 272-0711  
E-mail: [jhuang@justicefirstllp.com](mailto:jhuang@justicefirstllp.com)

JIVAKA CANDAPPA, SBN 225919  
5111 Telegraph Avenue, #215  
Oakland, CA 94609  
Telephone: (510) 654-4129  
Fax: (510) 594-9610  
E-mail: [jcandappa@sbcglobal.net](mailto:jcandappa@sbcglobal.net)

Attorneys for Plaintiff Abhinav Bhatnagar

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ABHINAV BHATNAGAR,  
Plaintiff,

vs.

JASON INGRASSIA, individually and in  
his official capacity; COUNTY OF  
CONTRA COSTA; and CITY OF  
SAN RAMON.

Defendants.

Case No.: Case No. CV07-02669 (CRB)

**DECLARATION OF JENNY HUANG  
IN SUPPORT OF STIPULATION AND  
PROPOSED ORDER TO EXTEND TIME  
TO FILE OPPOSITION AND REPLY  
BRIEFS ON PLAINTIFF'S MOTION *IN  
LIMINE***

I, JENNY HUANG, state under penalty of perjury as follows:

1. I am counsel for Plaintiff Abhinav Bhatnagar in the above-referenced action. I submit this affidavit in support of the Stipulation and Proposed Order to Extend Time to File the Opposition and Reply Briefs on Plaintiff's Motion *In Limine*.

2. On February 15, 2008, the parties attended a case management conference before Judge Breyer. At the request of Assistant County Counsel, Gregory Harvey, the court ordered the parties to submit briefing for a motion *in limine* to determine the admissibility of prior judicial findings underlying this case. The court ordered Plaintiff to file an opening brief by March 14, 2008 and for the hearing to be held on April 25, 2008. In regards to the deadlines for

1 filing the opposition and reply briefs, the court requested that the parties agree upon a briefing  
2 schedule.

3 3. Immediately after the case management conference, counsel for the parties met to  
4 discuss the briefing schedule for the opposition and reply briefs on Plaintiff's motion *in limine*.

5 4. It is my understanding and recollection that counsel for Defendant Ingrassia  
6 proposed dates for filing the opposition and reply briefs, but that all parties agreed to defer to  
7 motion deadlines as required by the local rules.

8 5. Based on that understanding and my review of the local rules, I believed that  
9 Assistant County Counsel timely filed an opposition brief for the municipal defendants by April  
10 4, 2008 and that Plaintiff's reply brief was due to the court on April 11, 2008.

11 6. I did not receive the opposition brief filed by Defendant Ingrassia until late in the  
12 afternoon on April 11, 2008, the same day that I believed Plaintiff's reply brief was due. I did  
13 not have an opportunity to read Defendant Ingrassia's opposition brief in its entirety and to fully  
14 respond to the opposition brief in the reply brief filed by Plaintiff on April 11, 2008.

15 7. After receiving the letter from counsel for Defendant Ingrassia, Noah Blechman,  
16 dated April 14, 2008, I phoned Mr. Blechman that same day and proposed that the parties agree  
17 to the terms of this stipulation and proposed order.

18 8. On April 14, 2008, I e-mailed Mr. Blechman a draft of the stipulation and  
19 proposed order and my supporting declaration. Mr. Blechman e-mailed me back and authorized  
20 me to file the papers filed herein by using his electronic signature.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
22 April 14, 2008 in Oakland, California.

23  
24 /s/ Jenny Huang  
25 JENNY HUANG  
26  
27  
28